

III. CONCLUSION

There is no public interest served by the proposal in this proceeding. The Commission's proposed expansion of the AVM rules will cause serious electromagnetic interference among all users of the 902-928 MHz band. The Commission should, therefore, return all parties to the status quo ante, reduce the allocation to wideband AVM from 8 MHz to 4 MHz and encourage all industry participants to negotiate technical solutions to cooperative sharing of this 900 MHz band.

The foregoing recommendations will make the best of an otherwise extremely difficult situation.

Respectfully submitted,

THE PART 15 COALITION

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LIST OF ATTACHMENTS

Attachment A:	Member Companies
Attachment B:	Part 15 Products
Attachment C:	Teletrac Marketing Example
Attachment D:	Technical Committee Scope and Charter

ATTACHMENT A:

Ademco	American Wireless
Amtech Logistics	Axxon/Life Point
California Wireless	California Microwave
Cincinatti Microwave	Cobra Electronics
Cylink	DAC
Enscan/Itron	Gambatte
Granite Communications	GRE America
Inovonics	Intermec
Metricom	Nav Guard
Persoft	Proxim
Radionics	Real-Time Data
Recoton	ROLM
Salient Communications	Sensormatic
SpectraLink	Spread Spectrum Technologies
Summit Design	Symbol Technologies
Tatung Telecom	Tetherless Access
Uniden Engineering Services	Utilicom
Voyager Technologies	Western Multiplex
Wise Communications	Xircom

ATTACHMENT B:

Cordless telephones
Data acquisition (SCADA) and process monitoring
 (chemical, energy and utilities)
Data collection terminals
 (industrial, medical, securities/commodity exchanges and
 retail)
Disaster recovery (commercial and government)
Environmental monitoring
Intelligent vehicle highway systems
Local area networks
Medical instrumentation
Metropolitan area networks
Notebook/notepad computers
Point-of-sale terminals
Remote audio/video (consumer)
Scale systems
Security systems (consumer, industrial, government)
Time and attendance systems
Utility meter reading
Wireless key and PBX

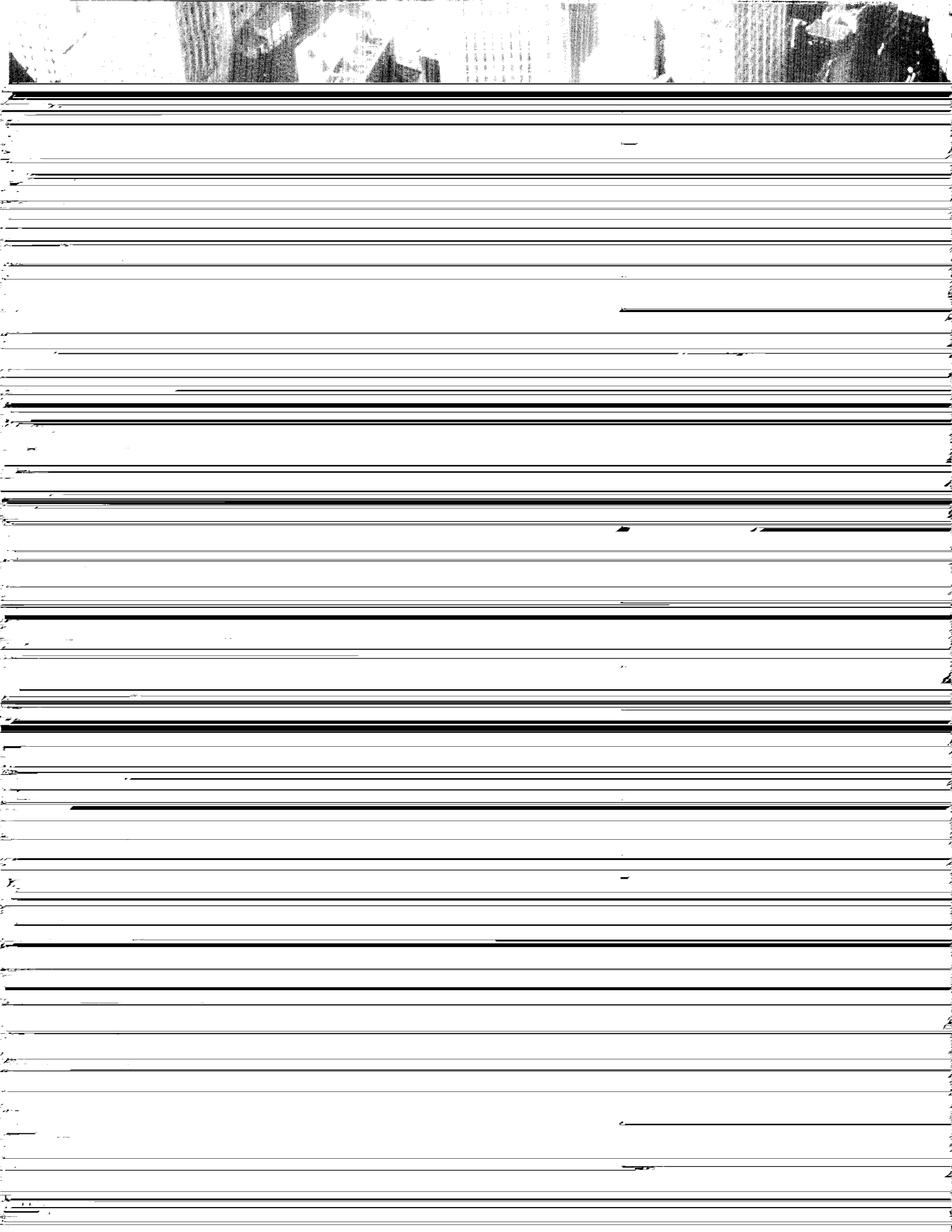
ATTACHMENT D:

Scope of the Joint Technical Committee (JTC) for Part 15/LMS Coexistence

The scope of the JTC is the consideration and development of technical solutions to permit LMS systems and Part 15 equipment to coexist in the 902-928 MHz band. Specifically, the JTC will review the technical parameters of the LMS and Part 15 equipment with particular attention to the technical compatibility of consumer cordless telephones, wireless PBX/key systems, data communication equipment and wideband pulse-ranging LMS operations.

Charter for the Joint Technical Committee

- I. The JTC will develop an agreed work plan and milestone schedule to ensure full coverage of the issues and rapid completion of the tasks.
- II. The JTC will review the technical operating environment of LMS systems and Part 15 systems.
- III. The JTC will develop a technical etiquette to optimize the operation of both LMS and Part 15 equipment.
- IV. The JTC will develop implementing rules to codify the etiquette in FCC rules governing both LMS and Part 15 equipment.
- V. The JTC will create a consensus report.



PACTEL TELETRAC'S DEVELOPING MENU OF CONSUMER INFORMATION SERVICES: EASY-TO-UNDERSTAND SOLUTIONS TO DAILY PROBLEMS.

PacTel Teletrac is developing a menu of inexpensive and easy-to-use information services consumers can use many times, every day. By simply interfacing a personal communications device — an organizer, in-vehicle navigator, cellular phone, notebook or personal digital assistant — to the PacTel Teletrac transceiver, consumers can have a wealth of information at their fingertips. Route guidance, traffic information and Mobile Yellow Pages are examples of the kinds of information services which can be accessed through the PacTel Teletrac network.

PacTel Teletrac makes it easy for the consumer to connect to the wireless revolution. The Teletrac text-based system provides dynamic information on demand; there is no need for a separate sign-on for each service. Simple encoded messages or short, free-form messages can be sent and received over the network.

Here are a few examples of how PacTel Teletrac can meet the information needs of consumers on the move:

P E R S O N A L I N F O R M A T I O N S E R V I C E S	
PROBLEM	SOLUTION
<input type="checkbox"/> "It's 8:00 a.m. and I have to get to the airport. What's the traffic like on the freeway?"	<input type="checkbox"/> Select destination. Reply includes traffic information and route choice given current traffic conditions. Receive text message on specific conditions relative to location of vehicle.
<input type="checkbox"/> "How do I get to the nearest ATM?"	<input type="checkbox"/> Scroll to <i>ATM</i> category. Receive text reply providing directions to the nearest ATM.
<input type="checkbox"/> "I want to catch a train/bus at Union Station..."	<input type="checkbox"/> Scroll to <i>Transportation</i> and select <i>Train</i> . Specify desired destination. Receive information on first available train, departure time and ETA to station.
<input type="checkbox"/> "I've got a flat... I need mechanical assistance."	<input type="checkbox"/> Scroll to <i>Emergency</i> and <i>Flat tire</i> . Send message. Receive confirmation and updates on ETA of tow truck.
<input type="checkbox"/> "I'm running late... I wish I could let my office know."	<input type="checkbox"/> Scroll to one of encoded messages and appropriate destination (i.e. home, office). Send message. The system will call and a digitized voice will relay the message. Recipient will confirm receipt on phone keypad, with confirmation sent to driver.
<input type="checkbox"/> "I'm in the mood for Chinese food. Where's the nearest restaurant?"	<input type="checkbox"/> Scroll to <i>Restaurants</i> and <i>Chinese</i> . Select desired price range. Receive 3 nearest locations, routes and phone numbers.
<input type="checkbox"/> "I want to go see <i>"Sneakers."</i> Where and when is it playing?"	<input type="checkbox"/> Scroll to <i>Entertainment</i> and select <i>Movies</i> . Key in first 3 letters of movie title. Receive 3 nearest locations with addresses, showtimes and routes to each.
<input type="checkbox"/> "My daughter is running late... I hope she's okay."	<input type="checkbox"/> Call PacTel Teletrac on phone (or log in with computer). Key in subscriber code and receive location of vehicle.

CERTIFICATE OF SERVICE

I, Michelle Tyler, hereby certify that a copy of the foregoing Comments of The Part 15 Coalition was mailed first-class United States mail, postage prepaid, this 28th day of June, 1993 to the parties listed on the attached service list.


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